

XPLR INFRASTRUCTURE, LP

CODE OF BUSINESS CONDUCT & ETHICS

XPLR Infrastructure, LP (“XPLR”) is a Delaware limited partnership, whose general partner is XPLR Infrastructure GP, Inc. (“XPLR GP”), and an indirect, majority- owned subsidiary of NextEra Energy, Inc. (“NextEra Energy”). XPLR accordingly has adopted the NextEra Energy Code of Business Conduct & Ethics (the “Code”), attached hereto, as its own Code of Business Conduct & Ethics. The Code applies to all employees, officers and directors of XPLR GP, XPLR and XPLR’s subsidiaries.

In reviewing the Code, please note the following:

1. References to “NextEra Energy” or the “Company” include XPLR and XPLR GP.
2. The policies of NextEra Energy referred to in the Code should also be considered to be the policies of, and are applicable to, XPLR and XPLR GP.
3. Questions about the Code may be addressed to the NextEra Energy personnel listed in the Code.
4. Reporting known or suspected misconduct¹ involving XPLR or XPLR GP, including concerns involving internal controls and financial reporting, may be directed to the channels set forth in the Code under “Personal Commitment” and the Reporting Concerns policy referenced therein.
5. References to shareholders include holders of XPLR common units.
6. XPLR’s common units are publicly traded securities and the Code section entitled “We Observe Securities Laws,” including the example given in that section, applies with respect to XPLR’s common units, any trading in XPLR common units and non-public information about XPLR’s business and operations.
7. Certain transactions between XPLR and NextEra Energy can appear to present conflicts of interest. Questions concerning any contract or transaction between XPLR and NextEra Energy should be addressed to the NextEra Energy personnel listed in the Code or to the Board of Directors of XPLR.
8. Any waiver of this code must be approved by the Board of Directors of XPLR and will be disclosed to XPLR unitholders in accordance with New York Stock Exchange rules.

Adopted: July 1, 2014

Last revised: November 3, 2025

1. Known or suspected misconduct includes, among other matters, fraud, forgery, embezzlement, bribery, kickbacks, bid rigging, alterations of company records, Code violations and deliberate attempts to circumvent XPLR control procedures.



CODE OF
BUSINESS
CONDUCT
AND
ETHICS

Note: The externally published version of the NextEra Energy Code of Business Conduct and Ethics contains inactive links to internal policy documents.

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Letter from Our Chairman, President and Chief Executive Officer

Dear Team:

At NextEra Energy, our greatest asset is our team, which I firmly believe is the best in our industry. Being the best comes with a lot of responsibilities, and some of the most important of those responsibilities are summarized in this document: our Code of Business Conduct and Ethics.

Our Code is a manual for how to successfully conduct business ethically and with integrity at NextEra Energy. Our “passion to be the best” shines throughout the Code’s substance, but also in how it is organized – making it easy to use and understand.

So how is our Code organized?

Our Code is organized to deepen everyone’s commitment to NextEra Energy’s three core values, so each subject in the Code corresponds to one of those values:

- » We are committed to excellence.
- » We do the right thing.
- » We treat people with respect.

The Code breaks down what it means to conduct business with integrity, using learning aids such as real-life scenarios, Q&As, and “DOs” along with “DON’Ts.” We also have included links to corporate policies and procedures that supplement each section of the Code in order to make the Code as practical as possible.

What should each of us do with our Code?

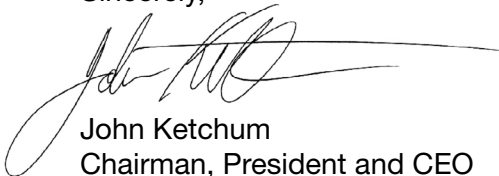
Read it. Digest it. Follow it. If you have questions, make it your responsibility to reach out to your leader or Compliance & Ethics.



Should you witness a violation – of this Code, any Company policy or the law – know that you are obligated to report it. The Company prohibits retaliation for reporting a suspected violation, in good faith, and we will honor that responsibility. In the spirit of continuous improvement, we also welcome any feedback on how we can make our Code easier to use and understand.

Part of what makes our team the best is our commitment to flawless execution in everything we do. By working together to follow the Code – and never losing focus on our commitment to customers and to each other – we will lead the golden age of power in America and continue powering today while building tomorrow.

Sincerely,


John Ketchum
Chairman, President and CEO



NextEra Energy Core Values

Our Values

We Are Committed to Excellence

By establishing high standards of quality, driving continuous improvement, making fact-based decisions, working safely and holding ourselves accountable, we cultivate the expertise and passion to deliver the best for our shareholders, customers, employees and other stakeholders.

We Do the Right Thing

By acting with integrity and humility in everything we do, living up to our commitments and being forthright and honest in our communications, we create an environment of openness and trust.

We Treat People With Respect

By leading respectfully, promoting teamwork and investing in development, we strengthen and engage our greatest asset – our people.



Our Values and our Code help us maintain accountability and integrity, ensuring the success of our employees and the Company.

Introduction: Doing Well by Doing Good

The Purpose of Our Code

As a NextEra Energy (the “Company” or “our Company”) employee, you are empowered to help create a better future. This kind of power comes with stringent requirements, however—namely, those set forth in our core values and in our Company’s Code of Business Conduct and Ethics (the “Code”), Company policies and the laws and regulations that govern our work.

While representing NextEra Energy, you should also strive to advance the interests of our Company, colleagues, customers, communities and other stakeholders.

Violations of our Code, values, policies or the law may carry serious consequences for the individuals involved, as well as for NextEra Energy as a whole. Individuals engaging in unethical or illegal behavior and those who direct, condone, approve or facilitate such behavior may be subject to disciplinary action, up to and including termination. Such conduct may also result in legal action. Behavior that violates the Code puts all of us at risk of a damaged reputation, negatively affects our stakeholders and may subject us to fines and civil or criminal liability. To help Company employees and those who do business on our Company’s behalf understand their obligations, the Code contains references and links to policies which are prescriptive, providing clear rules and guidelines for various topics and focus areas.

The requirements set forth in this Code must be followed. Our Code exists not only to demonstrate NextEra Energy’s commitment to doing the



right thing, but also to ensure our Company’s continued success. It gives us the guidance to act appropriately as we strive to reach our business goals and meet the needs of our customers and communities in an ethical and sustainable way.

Who is Expected to Follow Our Code

Our Code applies to everyone at NextEra Energy, including those who do business on our Company’s behalf, who are generally referred to in the Code as employees. You must read, understand and abide by our Code, as well as all the Company’s policies applicable to you, many of which are referenced in the applicable sections of this Code and are available in the policy library on [eWeb](#).

Where is Our Code Applicable

Employees, which in the Code includes those who do business on behalf of our Company, must follow our Code regardless of their location. Conduct offsite and/or outside of work which violates the Code or other Company policies can have an adverse effect on your teammates, NextEra Energy’s reputation and our ability to serve our customers.

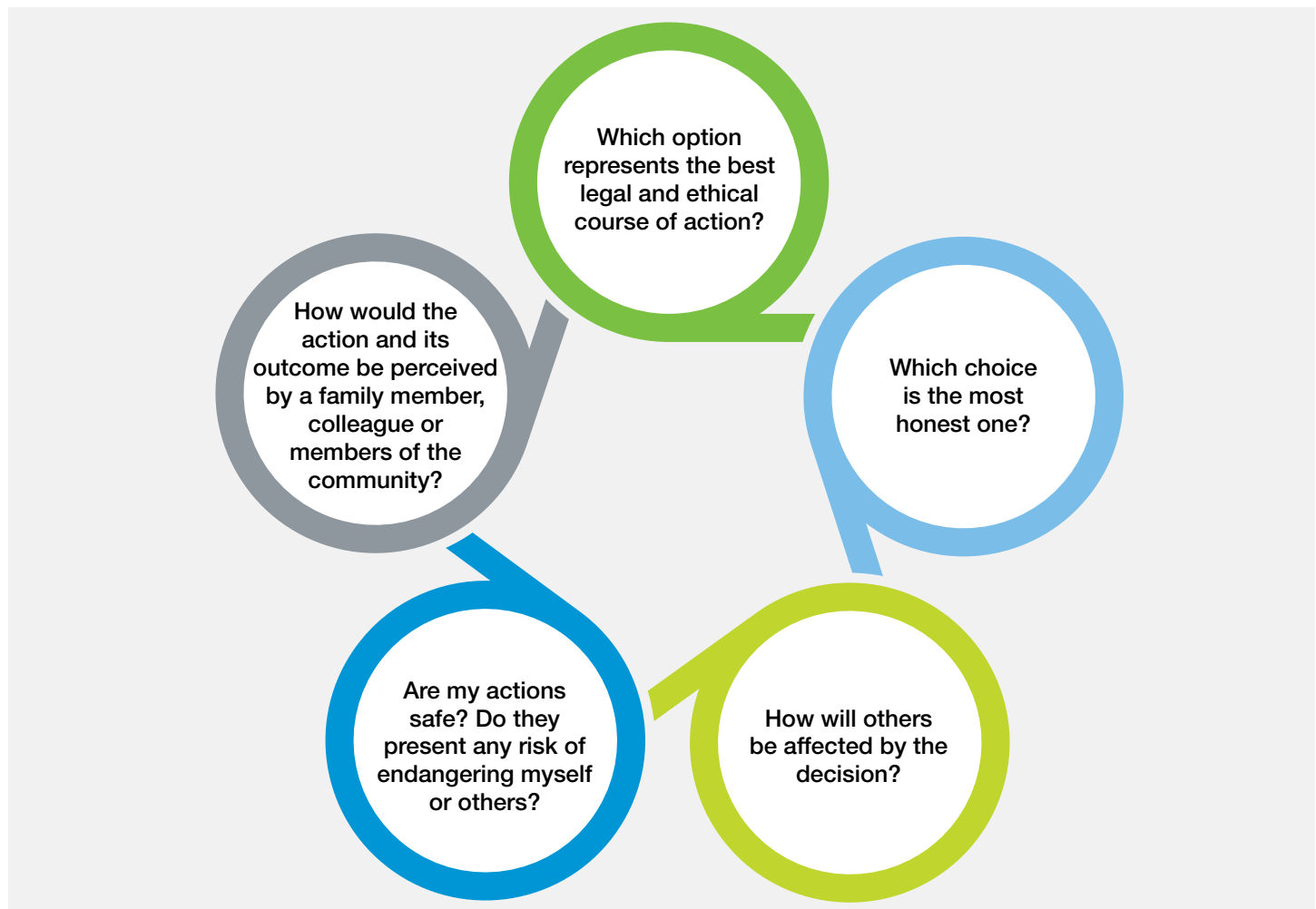


The Code establishes a framework for ethical conduct; however, it cannot address every potential ethical situation or form of improper behavior. All employees and those conducting business on behalf of the Company must exercise good judgment and uphold the highest ethical standards in all of their actions, even in circumstances not explicitly addressed by the Code.

Ethical Decisions

As you perform your work, you may encounter situations where doing the right thing seems to conflict with meeting financial or operational goals or with meeting a tight deadline. In these moments, our Code provides resources and guidance to help you determine the best course of action. Use it to identify where to go for answers, whether that means consulting a policy, contacting a subject matter expert or your leader, or reaching out to Compliance & Ethics (C&E).

When contemplating the best course of action, you need to consider the following:



In addition to following the requirements set forth in our Code and policies, all employees are expected to demonstrate their personal commitment to this Code. Employees must foster a workplace that promotes compliance by promptly escalating any known or suspected violation of our Code or policies, and by taking extra care in using and monitoring the use of all safeguards in the workplace, including Company procedures, safe work practices and personal protective equipment (PPE).

Leaders are expected to lead by example and demonstrate a strong commitment to our Code. They are also responsible for ensuring that no retaliation occurs against anyone who, in good faith, raises a concern or reports a violation. If retaliation is witnessed or suspected, it should be reported and appropriate action will be taken—regardless of who is involved.



Expectations for Leaders:

- » Model ethical behavior and promote awareness of our Code, our policies and procedures and applicable laws and regulations.
- » Create an “open-door” environment where everyone feels comfortable asking questions, making reports or raising concerns.
- » Promptly escalate any known or suspected violations of our Code, our policies or the law.
- » Factor an employee’s commitment to ethics and compliance into feedback and evaluations.
- » Ensure the proper use and monitoring the use of all of our workplace safeguards, including Company procedures, safe work practices, and personal protective equipment (PPE).
- » Ensure completion of all required compliance training, both personally and by the employees under their supervision.

Individual Commitment

Each of us—regardless of title, role, or tenure—has a personal responsibility to uphold the standards in our Code, comply with applicable laws and regulations, and follow all Company policies. This applies whether we work inside or outside the United States.

While our Code sets clear expectations, it can’t anticipate every situation. That’s why good judgment, integrity and a willingness to ask questions are essential to doing what’s right. If you’re ever unsure about the correct course of action, don’t hesitate to speak up. Use the Code, Company policies, and the law as your guide—and when in doubt, ask.

Each year, employees must certify that they have read and understand the Code. But honoring the Code goes far beyond checking a box. It means making ethical decisions, speaking up about concerns, and holding ourselves—and each other—accountable.

The Company is committed to maintaining an open environment where questions and concerns are taken seriously and addressed appropriately. If you see or suspect a potential violation of the Code or Company policy, or if something simply doesn’t feel right, report it. Even if you’re not certain a violation has occurred, reporting a good faith concern is the right thing to do.

If you know or even suspect that misconduct has occurred or if you simply have a question about the right course of action, talk to your leader, a business unit head, Human Resources, Internal Audit or the following:

A Compliance Officer

- » Vice President (VP), Compliance & Corporate Secretary
- » VP, Internal Audit
- » Executive Vice President (EVP), Chief Legal, Environmental & Federal Regulatory Affairs Officer

Equal Employment Opportunity Hotline

or visit the [Equal Employment Opportunity Program](#) page for more options

Code of Business Conduct & Ethics Hotline (Ethics Hotline)

888.906.9NEE (888.906.9633) or complete the [Ethics Hotline form](#)

Nuclear Safety Employee Concerns Hotline

Corporate Security

or visit their [eWeb](#) page

Each hotline is available 24 hours a day, seven days a week. You are encouraged to reach out to any of these resources to ask questions, express concerns and report possible violations of our Code, Company policy or the law. You are strongly encouraged to identify yourself when making a report so that our Company can contact you for further information, if needed, as it conducts any investigation. NextEra Energy treats reported information in a confidential manner to the extent reasonably possible and as permitted by law. However, if you feel more comfortable doing so, you may make a report anonymously through the [Ethics Hotline form](#) or the [Equal Employment Opportunity Hotline](#).

For more information about reporting concerns, refer to the [Reporting Concerns](#) policy.

Non-Retaliation Commitment

If you observe or suspect any deviation from our Code, Company policies or the principles embodied by them, it is your responsibility to report your concerns. You can report your concerns through any of our channels without fear of retaliation or negative impact on your employment for having done so. NextEra Energy prohibits acts of retaliation against any person for reporting a possible violation in good faith or for participating in any investigation.

Acting in “good faith” means that you provide a sincere, complete report that you believe to be true. In other words, it does not matter whether your report uncovers actual misconduct, as long as you deliver it honestly and with all relevant facts. Anyone who retaliates against another individual for making a good faith report will be subject to discipline, which may include termination of employment. Conversely, anyone making a report that is done in bad faith, such as a report that is groundless or malicious, will also be subject to appropriate discipline.



NextEra Energy prohibits retaliation by leaders, peers and third parties for reporting a concern in good faith or participating in an investigation.

Reviews and Investigations

NextEra Energy is committed to addressing all concerns. When a concern is reported, the information is forwarded to the proper resource for review. If you make a report to the Ethics Hotline, you will receive a report number and PIN, so you can check on the status. While you may be asked to provide additional information, your identity and responses to any such requests will remain anonymous. The Company will post in the system a notification once the review or investigation has concluded.

Employees of NextEra Energy are required to cooperate with all investigations, subject to applicable law. This means that all communications you make about the topic of an investigation are to be delivered honestly and completely. It also means maintaining complete, authentic, reliable and accurate records of your business activities for the prescribed periods of time, as directed in our [Records Management - Policies and Responsibilities](#) policy. Failure to do so may subject you to disciplinary action.



NextEra Energy is committed to reviewing all reported potential violations of the Code, our policies and the law.

Investigation Process



1. REPORT SUBMISSION

There are various ways to report concerns, including speaking to a leader or to Human Resources, or by using our third-party Corporate Compliance and Ethics Hotline's (Ethics Hotline) phone number or secure online form, to name a few.



2. ROUTING

Each report received is reviewed and routed to the appropriate team.

3. INVESTIGATION

The appropriate team initiates their investigation process.



4. ANONYMOUS REPORTS

If the report was submitted anonymously to the Ethics Hotline, the reporter can check the status by calling or logging in to the web submission tool using the report key.



5. CLOSURE

Once the investigation is complete, steps are taken to address the matter, if deemed necessary, and the initial reporter could be notified of the investigation's closure.



6. TREND ANALYSIS

Continuous improvement is a priority at NextEra. Therefore, it is important that concerns are identified, reported, analyzed, and addressed to help us continuously get better.

7. EXECUTIVE REVIEW

The Ethics Committee, comprised of senior executives from several business units and the Ethics Office VP and Director, reviews reports and any associated remedial actions quarterly.



8. BOARD REVIEW

Annually, the Audit Committee of the Board of Directors reviews a summary of all substantiated reports and associated remedial actions.



See the [Reporting a Concern and Investigations](#) eWeb page for more information.

We Are Committed to Excellence

Federal Energy Regulatory Commission (FERC)

Numerous NextEra Energy subsidiaries are regulated by FERC and must follow FERC requirements. These requirements regulate the transmission and wholesale sales of electricity and natural gas in interstate commerce. FERC requirements are described more fully in the following sections.

FERC Standards of Conduct

FERC's Standards of Conduct (SOC) are intended to prevent transmission providers from giving their marketing employees preferential treatment or an unfair advantage by prohibiting the sharing of non-public transmission information.

The SOC requires that transmission function employees work independently from marketing employees. Marketing employees cannot have access to or receive non-public transmission information. Any such sharing of information requires immediate disclosure to the public. The SOC also requires that tariff provisions relating to the sale or purchase of open access transmission service be applied in a non-discriminatory manner. You are responsible for making sure that you understand and implement the Standards that apply to your job.

FERC Affiliate Restrictions

FERC's Affiliate Restrictions (Restrictions) are intended to make sure public utilities with captive



customers do not provide preferential treatment or unfair advantage to affiliated companies that sell electricity at market-based rates. The Restrictions require that employees of these groups must operate separately unless they are employees who provide shared services. The Restrictions require that public utility market information not be shared with its affiliated companies if such sharing could harm the utility's customers. You are responsible for making sure that you understand and implement the Restrictions that apply to your job.

FERC Cross-Subsidization Rules

The Cross-Subsidization Rules are intended to prevent utilities with captive customers from harming their customers by purchasing goods and services from affiliates at above-market prices or by selling goods and services to them at below-market prices. You are responsible for understanding and implementing the Cross-Subsidization Rules that apply to your job.



We comply with FERC, NERC and applicable state compliance codes of conduct.

North American Electric Reliability Corporation (NERC) Reliability Standards

NERC is the organization whose mission is to ensure the reliability of the bulk power system in North America. To do so, FERC granted NERC the authority to develop, monitor and enforce Reliability Standards.

Reliability Standards are the planning and operating rules that electric companies follow to make sure we provide reliable electricity. As part of these Reliability Standards, NERC developed the Critical Infrastructure Protection (CIP) Reliability Standards to protect against utility cyberattacks. You are responsible for making sure that you understand and implement the Reliability Standards requirements that apply to your job.

Florida Public Service Commission (FPSC) and State Compliance Codes of Conduct

Florida Power & Light Company (FPL) is an electric utility regulated by the FPSC. We must adhere to the rules and regulations set forth by that commission. Some of our regulated businesses operate in states outside of Florida such as Texas and California, for instance, which require independent operations for regulated entities and identified affiliates. These requirements include prohibitions on sharing non-public information or providing preferential treatment to affiliates. You are responsible for making sure that you understand and adhere to applicable State Code of Conduct requirements that apply to your job.

For more guidance on FERC, NERC and the State Compliance Codes, visit the [Compliance & Ethics eWeb page](#) or contact the VP, Compliance & Corporate Secretary.

We Maintain Accurate Records

When it comes to ensuring the accuracy of our financial and other records, we each have a role to play in ensuring that the information is



NextEra Energy employees are expected to:

- » Be familiar with and follow our energy trading and risk management policies and procedures, as well as the Commodity Futures Trading Commission (CFTC), FERC, Regional Transmission Organization (RTO) and Independent System Operator (ISO) rules and regulations.
- » Direct any questions regarding commodity marketing and trading activities to your leader or **C&E**.

entirely truthful. As a publicly traded company, it is imperative that we prepare all our financial statements in accordance with generally accepted accounting principles and properly represent the financial condition and results of our Company. All reports that we file with a government agency must be complete and accurate and must not mislead, misrepresent or omit information, no matter what.

In order to protect the integrity of our books and records, you have a duty to report any instances of incorrect or fraudulent record keeping, false representations (oral or in writing) or the hiding or mischaracterizing of Company funds, assets or transactions—whether by another NextEra Energy employee or a third party. You must submit any concerns or complaints through any of the reporting channels listed in our Code.

Records Retention

Managing our records is a critical component of building trust with our customers, regulators and shareholders. Effective records management allows us to meet our business needs and ensure our records are readily available when we need them. It also helps us comply with all applicable laws and regulations and preserve any relevant records in case we need them for litigation, audits or investigations.

That is why it is critical for you to follow our Company's records management policies and retention schedules. These items are resources that define what business records need to be retained, the length of time business records must be retained, the appropriate procedures for complying with legal holds and other responsibilities. (A legal, or litigation, hold applies to documents connected with actual or anticipated litigation. Accordingly, all relevant documents must be retained for the duration of the hold).

For more information about this section, refer to the **Records Management – Policies and Responsibilities** policy and the **Documents Subject to Litigation Hold** policy.

Internal and External Audits

When internal and external auditors request information from us, it is our responsibility to provide this information, never impeding or delaying any requests made in connection with an audit. If you have questions about a request, ask the appropriate auditor or a Compliance Officer.

Government Investigations and Other Inquiries

We all have a duty to cooperate fully with government investigations, audits and other inquiries. This means we are required to provide the appropriate information, as requested, in a timely manner. However, if you receive any requests for information associated with an investigation, you should immediately contact **General Counsel**.

We Observe Securities Law

In the course of your work, you may become aware of information about our Company (or other companies) before the public hears about it.



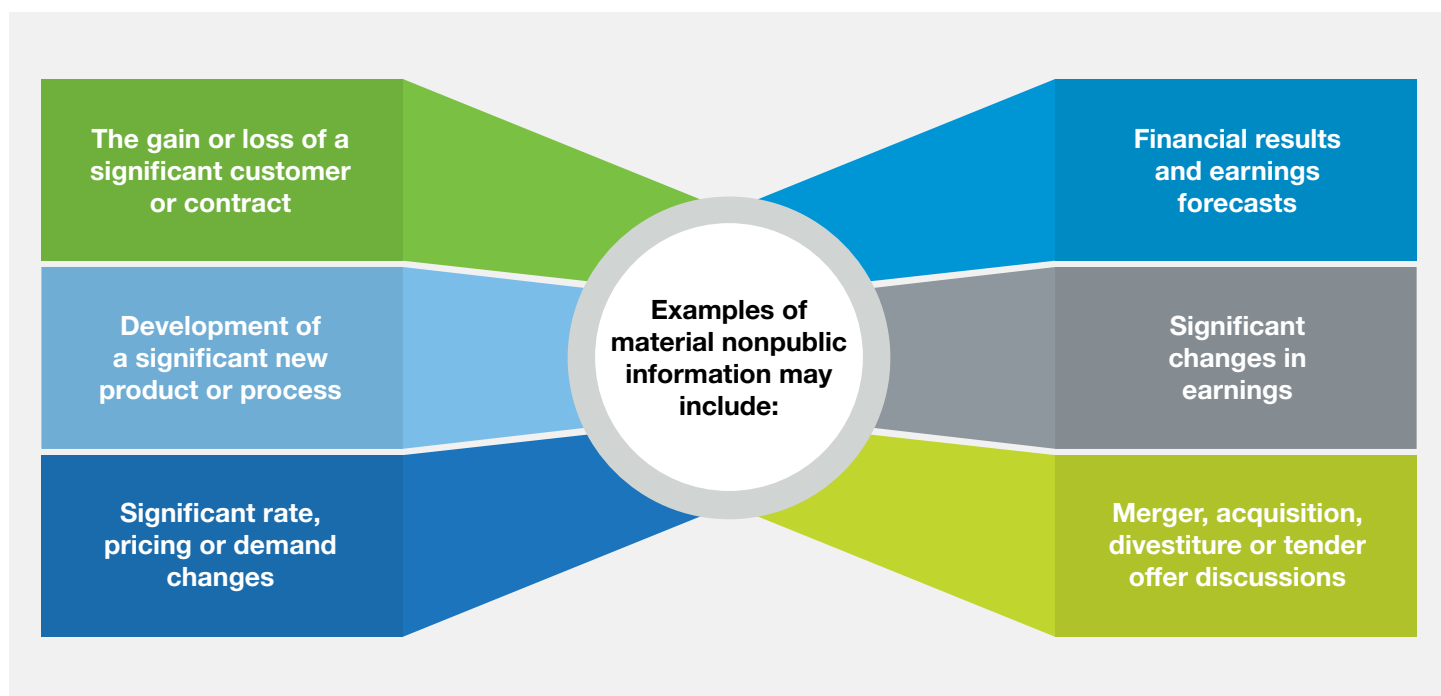
Keep in mind that it is unlawful for you to destroy, conceal or falsify any document for purposes of obstructing any governmental or legal proceeding, investigation or lawsuit.

It is important that you never disclose or use for your personal benefit, or the benefit of others, any material nonpublic (or “inside”) information you know or possess.

Material nonpublic information comes in various forms. Generally, it is information that a reasonable investor would consider important when making an investment decision, like buying or selling stock.



The purchase or sale of securities while knowing material nonpublic information or the disclosure of material nonpublic information to others who then buy or sell securities based on it, is prohibited.



Trading on material, nonpublic information is a violation of insider trading laws, which can subject the individuals involved to disciplinary action, up to and including termination of employment, as well as to potential civil and criminal penalties. It is also illegal to provide inside information to others (or “tip” them) in making their investment decisions. You should also be sure to know and follow specific laws, such as Regulation Fair Disclosure under the Securities and Exchange Act of 1934 (Regulation FD). This regulation makes it illegal to selectively disclose material, nonpublic information.

To help us comply with these rules, our Company has established procedures for the release of material nonpublic information, including the designation of Company spokespersons. These procedures ensure that information reaches the public in an appropriate way. You may not disclose material, nonpublic information to anyone outside our Company, unless you are specifically authorized to do so by NextEra Energy’s **public communication guidelines** and **Regulation FD** policy. This includes discussions concerning NextEra Energy business in all social media forums, as well as other verbal and non-verbal forms of communication.

For more information about this area, please see our **Securities Trading** policy, **Regulation FD** policy and our **public communication guidelines**.

Q: Sheila is a financial analyst in the Financial Center of Excellence and just learned that the Company is planning to announce a major acquisition next month that hasn't been disclosed to the public yet. Sheila's neighbor, Kevin, mentioned at a barbecue that he's thinking about buying some NextEra Energy stock. Can Sheila give him a heads up that it might be a good time to invest?

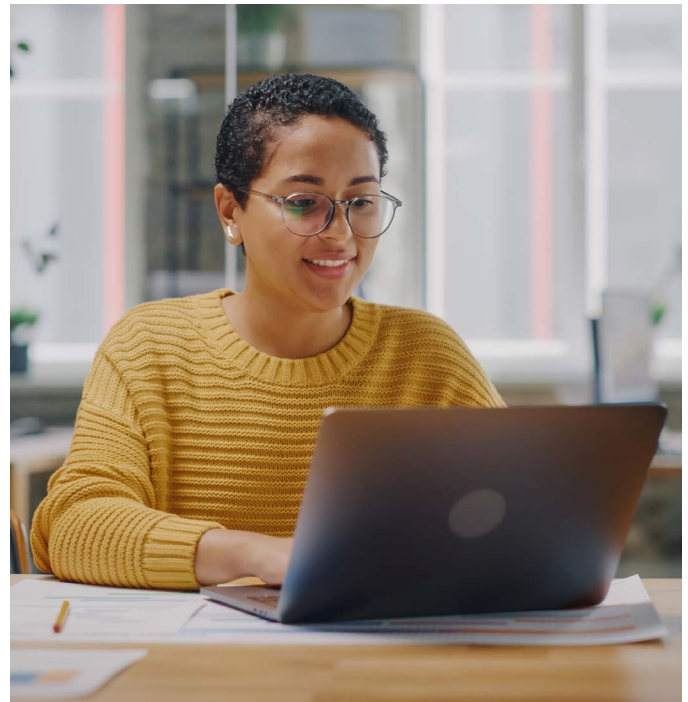
A: No, absolutely not. The acquisition information Sheila learned is material, nonpublic information that could significantly impact NextEra Energy's stock price. Sharing this information with Kevin would constitute illegal "tipping" under insider trading laws, even though Sheila wouldn't personally benefit from Kevin's investment decision. This could result in serious consequences, including termination of Sheila's employment and potential civil and criminal penalties for both Sheila and Kevin. Sheila should only discuss publicly available information about NextEra Energy's business and direct Kevin to our official public communications and SEC filings if he wants to make informed investment decisions.

We Safeguard Company Assets and Information

To perform your daily work, you use various assets – assets that are placed in your care by NextEra Energy. You are responsible for protecting all property and resources entrusted to you, including any equipment, facilities, funds, data and documents to which you have access. You must take reasonable precautions to protect all Company assets against theft, damage and misuse.

You must keep in mind that Company assets are intended to be used for business purposes, subject to very limited exceptions. Likewise, Company devices are important and costly assets and should always be used appropriately and responsibly. You should avoid leaving any devices where they could be lost, stolen or compromised.

For more information, refer to the [Information Technology, Records Management](#) and [Corporate Credit Cards and Reimbursement of Employee Expenses](#) policies.



Saving or copying sensitive or confidential Company information to a personal device not enrolled in an authorized Company protection system is prohibited.

Confidential and Proprietary Information

The assets we use in our daily work are not always tangible. In fact, one of our most valuable resources at NextEra Energy is our Company's confidential and proprietary information – information that is not available to the public. This kind of information must be protected as carefully as you would guard the laptops and other devices that contain it. You may only share this information with people who are authorized to have it for legitimate business purposes. You are expected to understand the types of information considered to be confidential to the Company and the business units with which you work.

Personally Identifiable Information (PII) is any information that permits the identity of an individual to be directly or indirectly inferred, including any information linked or linkable to an individual, including Personal Health Information (PHI).

Confidential Information (CI) is information that has not been made available to the general public, and is proprietary to, and for the internal use of, the Company.

Broadly speaking, Personally Identifiable Information includes:

- » User ID/passwords.
- » Financial account information.
- » A username or email address in combination with a password or security question and answer.
- » Social security number or similar ID number.
- » Date of birth.
- » Mother's maiden name.
- » Passport number.
- » Driver's license number.

- » Personal health information.
- » Biometric data.



Confidential information can include:

- » Business plans and strategies.
- » Third-party or vendor information subject to a confidentiality or non-disclosure agreement.
- » Pricing policies or budgets.
- » Non-public information of products, services, customers and employees (e.g., customer account numbers).

Confidential information also includes trade secrets or data that give a company a competitive advantage. Some examples of trade secrets may include:

- » Customer lists and customer usage.
- » Terms and conditions, rates or fees offered to certain customers.
- » Technological developments.
- » Operation plans and processes.

If you possess Company trade secrets or any other confidential or proprietary information, do not disclose it without a clear-cut business need and prior authorization to do so. Properly securing your devices when you are not using them and encrypting and password-protecting information helps protect the sensitive information in your care. In addition, avoid discussing such information in places where you can be overheard, such as restaurants, airports, elevators, ride-sharing vehicles and other public spaces. Your obligation to protect confidential and proprietary Company information continues even after your employment ends. You also have an obligation to protect the information shared by our employees, customers and business partners. To do so, you must uphold NextEra Energy's privacy policies when employees' and third parties' PII or CI is collected, stored, processed, transmitted or shared.

For more information about this section, refer to the [Confidential Records – Accessing, Handling and Destroying](#) policy, the [Cyber Access](#) policy, the [System Password](#) policy, the [Acceptable Use](#) policy and the [Corporate Privacy](#) policy.

Employee Privacy

As an employee, you provide sensitive personal, medical and financial information to our Company. NextEra Energy is committed to taking steps to secure this information and protecting your personal privacy. To access sensitive information about your fellow employees, you must have specific authorization and a business need to do so. If the nature of your job requires you to come into contact with this information, you must treat it with special care.

Keep it secured from loss or theft and use it only as is necessary, according to the law and Company policies and procedures. When sending PII or CI to an outside source, use all reasonable safeguards against loss, destruction or inadvertent disclosure.

For more information, refer to the [Employee/Personnel Files](#) policy and [Online HIPAA Privacy and Security](#) policy.

Q: While preparing a presentation for the quarterly review meeting, Chanelle, a business analyst at FPL, accidentally includes a spreadsheet containing customer social security numbers and account details in her email to the entire project team of 15 people, including external consultants. She realizes her mistake immediately after hitting “send” and notices that two team members have already opened the email attachment. What should Chanelle do immediately upon realizing she inadvertently disclosed PII?

A: When PII is inadvertently disclosed, immediate action is required. Chanelle should immediately issue an email recall. Then she should contact her leader and inform them of the incident and potential scope of exposure. Next, she should notify the Privacy Incident Response Team (PIRT) to conduct an immediate assessment. Lastly, she should send a notification to the impacted email recipients asking them to delete the email without reviewing the content, confirm the deletion in writing and not to share or discuss the information.

Privacy Concern Contacts

Corporate Security	24/7 Security Operations Center at: [REDACTED] or Security.Operations@fpl.com
HIPAA Privacy Officer	Sr. Director Employee Benefits For details, view the Online HIPAA Privacy and Security policy
Cybersecurity	cybersecurity@nee.com
Privacy Incident Response Team (PIRT)	privacy@nee.com



In the event of any actual, suspected or potential breach of control over or inappropriate disclosure of Personal Health Information (PHI) contact the HIPAA Privacy Officer immediately.



Intellectual Property

While many of us possess confidential and proprietary information about our Company, some of us may also have access to NextEra Energy's Intellectual Property (IP). IP – while valuable to our Company – is not always confidential information. Much of our IP is public information; it is just protected by law. For example, IP can include information such as copyrights, trademarks, designs, logos and brands, as well as information communicated orally or through written and electronic documents. Like other types of information, the unauthorized release or use of our IP could prove harmful to our organization.

For more information about how to handle proprietary, confidential or IP assets, be sure to review the [Confidential Records – Accessing, Handling and Destroying](#) policy.



NextEra Energy owns the rights to all IP created with Company materials, on Company time, at the Company's expense or within the scope of your duties.

We Use Company Technologies Responsibly

As part of our work, we often draft emails, instant messages and text messages on Company-provided devices and personal devices which have access to Company-provided applications. When doing so, be certain to compose your communications with the same care you take in composing any other NextEra Energy document.

Electronic messages, both personal and business-related, are lasting and recoverable written records that can easily be copied, altered and forwarded without your knowledge or consent. At no time may you use Company resources for unauthorized, illegal or unethical purposes. Any use of Company assets that may be construed as harassment or offensive to others is strictly prohibited.

Furthermore, you are responsible for using NextEra Energy's network and technology assets ethically and legally and doing your part to help protect our Company's assets from cyberattacks. While occasional and appropriate personal use of these assets is permitted, you should remember that our Company reserves the right to monitor your use, except when prohibited by law. You should review and follow all security measures and internal controls for our information and communications systems.

We Use Artificial Intelligence Responsibly

At NextEra Energy, we recognize Artificial Intelligence (AI) as a powerful tool to enhance our capabilities and better serve our customers. However, with this power comes the responsibility to use AI lawfully, ethically, transparently and in alignment with our core values.

AI systems must be designed and deployed with human oversight, maintaining our commitment to safety, reliability, and lawful and ethical decision-making. We ensure AI solutions are fair and explainable, and protect both Company and personal information.

For more information, refer to the [Responsible AI](#) policy.

NextEra Energy employees are expected to:

- » Report new AI tools or builds through the [AI System Questionnaire \(AISQ\)](#).
- » Report new AI procurements or new AI tools being implemented by an existing vendor by submitting a [Cyber Vendor Risk Assessment \(CVRA\)](#) and following the existing sourcing process.
- » Never share confidential Company information with external AI tools.
- » Ensure AI-generated information is verified before use or distribution.
- » Label AI-enabled outputs appropriately so users understand when they're interacting with AI systems.

Q: Mark, a financial analyst at NextEra Energy, has discovered a new AI-powered financial modeling tool called “FinanceBot Pro” that could significantly speed up his quarterly budget analysis. The tool requires him to upload historical financial data to generate predictive models and create automated reports. Mark is excited about the potential time savings and wants to test it immediately using the Company’s actual quarterly revenue data, customer billing information and competitive pricing strategies. He plans to use the AI-generated analysis directly in his presentation to senior management next week, noting that the tool’s output looks professional and comprehensive. What should Mark do before using this AI tool?

A: Since this is a new external tool, Mark should submit a [Cyber Vendor Risk Assessment \(CVRA\)](#), avoid uploading confidential data and verify all AI outputs before use. All new AI tools require proper evaluation before deployment. Additionally, finance applications will be subject to periodic reviews, impact assessments and human oversight to ensure they function in compliance with the [Responsible AI](#) policy. Mark should initiate the approval process, use only non-confidential data for any testing conducted while awaiting approval, verify all outputs and ensure proper disclosure of use of the AI tool.



AI should enhance human judgment, not replace it. When in doubt about AI use, consult with the Enterprise AI team or your leader.



Cybersecurity

Protecting Company data is important to the security of NextEra Energy and it is imperative that individuals having access to Company assets understand the significance of their duty to join the fight against cyberattacks.

As an added layer of security, you must safeguard your passwords and other access codes by not divulging them to anyone else. You should never allow others to use your accounts – even fellow employees. Software on your computer and other electronic devices is Company property and must be used according to licensing agreements; you may not copy it without permission.

Each of us is responsible for adhering to all Cybersecurity and Data Privacy policies. Violations of these policies may result in discipline, up to and including termination of employment.

Individuals with access to Company assets are expected to:

- » Not respond to any emails that appear suspicious or click on any links or attachments embedded in these types of emails.
- » Report suspicious emails immediately.
- » Use strong passwords and ensure they are unique to each account and updated regularly.
- » Never reveal your password to anyone. If it becomes known or you suspect someone might have guessed it, change it immediately.

For more information, refer to the Electronic Communications policy, the Software on NEE Computer Systems policy, the Acceptable Use policy, other Information Technology policies or refer to the Cybersecurity eWeb page.



Cybersecurity is everyone's responsibility, as all employees – regardless of their role – have access to vital information that must remain secure.



We Do the Right Thing

We Protect the Environment

At NextEra Energy, we comply with all environmental laws, regulations and permit requirements. We design, construct and operate our facilities in an environmentally sound and responsible manner. We also respond immediately and effectively to any known environmental hazards or noncompliance situations. Our commitment to the environment does not end there. We proactively pursue opportunities to exceed current environmental standards, including reducing waste and emissions of pollutants, recycling materials and conserving natural resources throughout our operations. We also encourage the efficient use of energy, both within our Company and in our communities.

These actions are just a few examples of how we are committed to the environment. To learn more, refer to the **Corporate Environmental** policy.

To ensure that NextEra Energy is adhering to its environmental commitment, we have developed rigorous environmental governance procedures and programs. These include our Environmental Assurance Program and Corporate Environmental Governance Team. Through these programs, we conduct periodic environmental self-evaluations to verify that our operations are in compliance with environmental laws, regulations and permit requirements. Regular evaluations also help us identify best practices and opportunities for improvement.



For more information about environmental governance programs and other environmental questions, you are encouraged to contact the VP, Environmental Services.

Q: Lucas works at a power plant and has received extensive training on environmental rules, permit requirements and how to minimize environmental impacts. One day, Lucas noticed oil on the ground next to a barrel and it looked like dirt was being used to cover up the spill. His team was pressed for time that day, but he is concerned about the impact of the spill on the environment and he knows from his training this kind of spill may have to be reported. What should he do?

A: At NextEra Energy, we are committed to doing what is right for the environment. When pressed for time, many people are tempted to cut corners and ignore important rules and safeguards. However, not cleaning up a spill can have a devastating impact on the environment and could create a hazard for human health. In addition, there are reporting requirements for certain types of spills and not complying with them could lead to sanctions and criminal charges. Lucas is expected to immediately report this type of incident to his supervisors, as well as follow established processes to address the problem and prevent such incidents from occurring again.

We Avoid Conflict of Interest Situations

When working for NextEra Energy, you make a commitment to act in the best interest of our Company. In order to perform your duties free from unfair bias, you must be alert to any situations that may create an actual or perceived conflict of interest.

A conflict of interest is not necessarily unethical, nor does it always constitute a violation of our Code. However, it is necessary for you to disclose actual or potential conflicts promptly, to ensure a fair and prompt resolution. However, that disclosure alone is not enough – as always, you are expected to do the right thing and act with transparency and integrity until the situation is appropriately documented and resolved.



A conflict of interest is any activity, investment, interest, association or relationship (including relationships with immediate family members, relatives and friends as well as close personal relationships) with others which conflicts with the independent exercise of judgment in connection with your duties and/or employment with the Company.



Personal Relationships and Business Decisions

Avoid situations where you, your relatives, or persons with whom you have a close personal relationship could benefit from your business decisions. Additionally, the **Employment of Relatives** policy and the **Conflict of Interest** policy must be followed when hiring or selecting employees, vendors or suppliers for positions that involve your relatives or persons with whom you have a close personal relationship.

If you are involved in any portion of the decision-making process regarding a transaction involving NextEra Energy and any third party in which you, a related person or someone with whom you have a close personal relationship with has an interest, you must submit a **COI Form**, notify your leader immediately and remove yourself from the decision-making process.

Outside Business Activities

Engaging in a business or investment opportunity that competes with NextEra Energy creates a conflict of interest and impairs your ability to make objective business decisions on behalf of NextEra Energy. Avoid any business or investment activities that compete with NextEra Energy, whether they benefit you personally or someone else. In addition, you must never help anyone else take such business or investment opportunities for personal or other third party gain.

You must not use Company property, Company information or your position for your personal gain or the personal gain of your relatives or persons with whom you have a close personal relationship. To preserve our Company's interest, you must not take employment with a NextEra Energy business partner or competitor while maintaining your employment with NextEra Energy.



Because taking outside employment may create a conflict of interest, you must disclose it to your leader and complete a COI Form before accepting a second job.

Examples of potential conflicts may include, but are not limited to:

Activities Requiring Disclosure		Policy
Influencing decisions	Having a substantial investment in any supplier, customer or competitor where the Company employee has influence over contracts, processes, products or makes supplier or Company business decisions with respect to that entity.	Refer to the Conflict of Interest policy.
Hiring	Filling a position with an immediate family member, relative or person with whom you have a close personal relationship.	Refer to the Employment of Relatives policy.
Outside employment	Acting as an employee, officer, representative, agent, auditor or advisor of a supplier, customer (other than one who simply has electricity supplied by FPL as a retail customer), partner, subcontractor or competitor of our Company.	Refer to the Conflict of Interest policy.
Boards and consulting arrangements	Acting as a member of a for-profit company board or having a consulting arrangement with a business or non-profit requires pre-approval from your leader and a Compliance Officer.	Refer to the Conflict of Interest policy.
Gifts	Accepting gifts, meals, entertainment, travel, lodging, payment or services from parties conducting business with or seeking to do business with our Company if that gift or other thing of value is intended to materially influence your behavior.	Refer to the Receipt of Gifts, Meals and Entertainment policy.
Trademarks	Using Company assets, including name, trademarks, trade names, facilities or relationships, for personal benefit or for outside work.	Refer to the Conflict of Interest policy.
Relatives and close personal relationships	Conducting Company business with any relative or any person with whom you have a close personal relationship. Conducting Company business with a business or a government agency that you or a relative or person with whom you have a close personal relationship is associated with.	Refer to the Conflict of Interest policy.
Investments and ownership interests	Having an investment in an entity that does or seeks to do business with our Company or is a supplier or competitor or in property (i.e., real estate, patent rights or securities) that our Company is seeking to purchase.	Refer to the Conflict of Interest policy.

Q: Jonathan, a senior procurement specialist, has been working with several vendors for solar panel equipment. During a vendor selection meeting, he learns that his brother-in-law recently started working as a sales director for SolarTech Solutions, one of the companies bidding on a major \$2 million contract. Jonathan's brother-in-law mentions at a family dinner that landing the NextEra Energy contract would "make his career" and asks Jonathan about the selection timeline. Jonathan has not disclosed this family relationship to anyone at work, and SolarTech Solutions is currently the leading candidate based on technical specifications and pricing. What should Jonathan do in this situation?

A: Jonathan should immediately disclose the potential conflict of interest to his leader, complete and submit the **COI Form** and remove himself from the vendor selection process. Further, he should avoid sharing any procurement information with his brother-in-law. At NextEra Energy, we maintain the highest standards of integrity in vendor relationships. We are committed to doing business with suppliers based solely on merit — the quality of products, services and operations. Personal relationships must never influence business decisions.

NextEra Energy employees are expected to:

- » Recognize situations that may create potential conflicts of interest between you and our Company.
- » Disclose actual or potential conflicts using the **COI Form**, consistent with **Conflict of Interest** policy. If you are in doubt about a situation, ask a Compliance Officer.
- » Not use Company assets, Company information or your position for your personal gain or the personal gain of those with whom you have a close personal relationship.
- » Exercise sound judgment and common sense, adhering to the highest ethical standards.

We Exchange Business Courtesies Ethically

At NextEra Energy, our reputation is dependent on the quality of our offerings – not our ability to be swayed by business courtesies or favors. To preserve our reputation as an industry leader and ethical company, you must use caution when giving or accepting gifts, entertainment or travel and/or lodging. You should not exchange business courtesies with an existing or potential supplier, contractor, vendor, business partner or customer if the intent is to elicit an unfair business advantage for NextEra Energy.

The Receipt of Gifts, Meals and Entertainment policy outlines the requirements for receiving gifts, meals, entertainment or anything of value from outside parties.

Key guidelines include:

- » Accept only non-cash gifts valued at \$250 or less.
- » Limit total gifts from the same outside party to \$250 per calendar year.
- » Meals and entertainment are acceptable when the giver is present and of reasonable value.
- » Never accept cash, gift cards or anything intended to materially influence business decisions.
- » Obtain supervisor approval before accepting travel or lodging.

Also keep in mind that the laws and policies that apply to providing gifts and entertainment to a government official are substantially more stringent than those that apply to our commercial partners. For additional guidance, please carefully review the “We Do Not Resort to Corruption or Bribery” section that follows.



NextEra Energy employees are expected to:

- » Obtain the appropriate approval for gifts, in accordance with our Receipt of Gifts, Meals and Entertainment policy.
- » Understand that you may attend the occasional meal or event, provided that the event is customary and reasonable, and both the provider and recipient are there.
- » Seek pre-approval, from your leader or a Compliance Officer and C&E, via a Gifts, Meals and Entertainment (GME) form, when offered travel or lodging.
- » Report any gift offered that does not comply with our policy to your leader or a Compliance Officer in writing and C&E, by submitting a Gifts, Meals and Entertainment (GME) form.

Q: Lisa, a project manager at NextEra Energy, has been working closely with GreenTech Solutions on a renewable energy installation project. The project has been successful, and GreenTech's account manager, Robert, wants to celebrate its completion. Robert invites Lisa to a steakhouse dinner and mentions that he'd like to give her a \$75 gift card to her favorite coffee shop "as a small token of appreciation for being such a great partner to work with." Robert explains that his company has a policy of showing appreciation to client partners and that this is the standard practice they follow with all successful projects. Lisa genuinely enjoys working with Robert's team and appreciates the professional relationship they've built. What is the appropriate response for Lisa regarding Robert's dinner invitation and gift card offer?

A: Lisa should accept the dinner but decline the gift card, as meals are acceptable, while cash-equivalent gifts, such as gift cards, are prohibited. Meals and entertainment are acceptable when the giver is present and within reasonable limits. Additionally, Lisa should use the **Gifts, Meals and Entertainment (GME) form** to report the gift to C&E, being sure to indicate the gift card was declined on the submission.

We Do Not Resort to Corruption or Bribery

As part of our commitment to ethical behavior, NextEra Energy will never tolerate bribery in any form. Even if we lose business or encounter delays because of our refusal to do so, we will never bribe any third party or allow or condone third parties to do so on behalf of NextEra Energy. We believe in ethically winning business through the quality of our products and services, never through bribery.

We abide by laws, treaties and regulations that forbid bribery, including the U.S. Foreign Corrupt Practices Act. To be a responsible member of our business community, you must follow these laws wherever you do business, regardless of local law or custom.

You must never agree to make facilitating payments, kickbacks or any cash or cash-equivalent gifts in any form, even if you are working in locations where they may be legal or common practice. You must never solicit, request or condone any improper payments from anyone on behalf of our Company, whether that person is an employee or a third party representing NextEra Energy.

The following are prohibited:

A **kickback** is the return of a sum already paid or due to be paid as a reward for awarding or fostering business while in the middle of negotiations.

A **bribe** is corrupt solicitation, acceptance, or transfer of value in exchange for official action.

A **facilitating payment** is usually small and usually made in cash to an individual in order to expedite standard government services, such as processing permits, providing police protection or expediting utility services.

A **cash or cash-equivalent gift** is a gift of local or foreign currency or anything with an identified cash value such as gift cards, travelers' checks, bearer instruments, coupons, notes and similar instruments or equity or debt instruments of any kind issued by any business entity.



It is also important to note that you may not hire a third party to do something that you are prohibited from doing under the Code or that you cannot ethically or legally do yourself.

For more information about this section, refer to the [International Anti-Bribery](#) policy.

NextEra Energy employees are expected to:

- » Not engage in bribery or corruption of any kind. This means you may not offer, authorize, or accept any attempt at bribery, kickbacks, or any other form of improper payment to attain a business advantage.
- » Ensure that any third party you engage to work with domestic or foreign government officials on our behalf follows the appropriate diligence process prior to engaging them. For additional guidance, please review carefully the “Political Participation Process” section further below. For any foreign business engagement, you must complete a [Request to Engage an International Business Party](#) form.
- » Avoid any activity that could be construed as bribery and consult with a Compliance Officer for any questions you may have. Anti-corruption laws are complex, and their violations can result in serious consequences.



We Comply with International Trade Laws

Although NextEra Energy primarily operates within the United States, you may occasionally interact with international entities or handle products, services, or information that cross borders. In these situations, it is essential to exercise caution and seek guidance when engaging in any form of international business – including travel for the Company. You should know that we are subject to U.S. laws that address international trade, sanctions, embargoes and boycotts affecting other countries and foreign companies or nationals. For example, you may see language in contracts that supports another group’s boycott or otherwise introduces trade restrictions. If you encounter contract language or requests that suggest participation in a prohibited boycott or a questionable trade practice, report it to General Counsel immediately.

Additionally, employees should understand that there are regulatory restrictions on sharing certain technologies and information—known as Controlled Technology—with non-U.S. persons. Even limited access or disclosure can be considered a “deemed export” under U.S. law. If your role involves handling such technology or information, ensure you comply with the Export Control and Technology Access policy and seek clarification from C&E when needed. When in doubt, always ask questions and consult the appropriate resources to ensure compliance with all applicable laws and company policies.

For more information about this section, refer to the Export Control and Technology Access policy.



We Give Back to Our Communities

NextEra Energy sends a strong message of support for our communities and encourages your involvement in volunteer activities that reinforce this message. You may take part in these activities on behalf of our Company, so long as both the charity and/or activity have been approved.

For further information, refer to **FPL's Community Activity/Sponsorship Expenses** policy. For NextEra Energy Resources approval, refer to the **Commitment Authority** policy.

Political Participation Process

You are encouraged to participate in political activities and have the right to donate your time and your money to the political process provided you do so as an individual, not as a Company representative. Prior to participating in a political campaign or running for political office, you must provide written notice to your leader and the VP, External Affairs and Economic Development, FPL. All political activity must be on your own time and at your own expense and must not interfere with your job responsibilities. Political discussions or campaigning pursuits with coworkers during the workday are prohibited.

If you want to use Company assets, facilities, time or funds for political activities, it must be pre-approved by the relevant contact listed in the table at the end of this section.

You must not engage in, or hire third parties to engage in, lobbying activities on behalf of NextEra Energy, without prior consent from the applicable VP according to the table that follows. Further, lobbying activities may require disclosure and may be subject to specific rules. It is your responsibility to ensure that you are in compliance with the applicable laws.

Your activities may be considered “lobbying” if your work involves:

- » Contacts with legislators, regulators and executive-branch or high-level officials or their staffs.
- » Communications with government officials.
- » Efforts to influence legislative or administrative action.
- » Providing gifts or entertainment to government officials.



NextEra Energy funds may not be used to contribute to any political party, committee, candidate, holder of any government position or social welfare organizations, unless such contribution is permitted by law and complies with Company policies, including receiving internal approvals where required.

In most – if not all – states, counties and municipalities, it is illegal to make contributions or give gifts to politicians, political parties or public officials that are intended to influence official actions. Therefore, any political contributions of corporate funds or other assets must be done in accordance with the **Political Engagement** policy. If you have any questions, please contact the appropriate officer listed in the following table.

For:	Contact:
U.S. federal political matters	Senior VP, Government Affairs - Federal
State of Florida political matters	VP, State Legislative Affairs, FPL
Local political matters in Florida	VP, External Affairs and Economic Development, FPL
Political matters in other U.S. states	VP, Regulatory & Political Affairs, NEER
Foreign political matters	EVP, Chief Legal, Environmental & Federal Regulatory Affairs Officer

For more information about this section, refer to the **Employee Practices for Public Duties and Citizenship Activities** policy and the **Lobbying and Political Consultant Procurement** policy.

NextEra Energy employees are expected to:

- » Act independently and not represent our Company when participating in political campaigns or seeking political office.
- » Notify your leader and the VP, External Affairs and Economic Development, FPL before making plans to campaign or serve in public office.
- » Leave all decisions to make political contributions on behalf of the Company to the officers listed above.

Personal or Individual Activities

It is important to note that, while your participation in community, charitable and political activities is encouraged, you should not pressure your coworkers to join you in these endeavors. Accordingly, you should not use Company time or resources to solicit another employee, except for Company-sponsored causes. If you would like to raise awareness for a charitable cause, ask your leader for help in doing so in an appropriate, professional way.



We Communicate Truthfully with the Public

Our policy is to communicate truthfully with the public. At the same time, we aim to be consistent in our messaging and are careful to promote our Company's best interests. For this reason, only authorized individuals can speak with the media on NextEra Energy's behalf. If you receive a request from the media, anyone seeking a public comment or another interested party, you should refer the inquiry to your leader and the marketing & communications media line at 561-694-4442. For inquiries from investors, refer the request to our investor relations department. Do not respond yourself.

If you are interested in speaking publicly or publishing an article as a NextEra Energy representative, you must obtain permission in advance from the Senior VP, Communications & Corporate Affairs. Refer to the [Requests/Inquiries Received from News Media or Other Parties](#) policy for more information.

Social Media

Each of us must exercise thoughtfulness and care with our online activity. This is because online and social media use—whether for business or

personal purposes—can affect the Company's reputation, our workplace environment and stakeholder relationships. Furthermore, no person may use social media on behalf of our Company unless specifically authorized to do so by the Company. If you are assigned to use social media on behalf of our Company in connection with your assigned job duties, you must follow all Company policies and clearly disclose your affiliation with NextEra Energy.

Refer to the [Social Media](#) policy for additional information.

Electronic Communications

You should remember that electronic messages (such as emails and text messages) are permanent, transferable records and can affect the reputation of our Company. If you believe you have witnessed an inappropriate use of NextEra Energy technologies or electronic communications on social media, immediately notify the Senior VP, Communications & Corporate Affairs.

For more information, refer to the [Electronic Communications](#) policy or the [External Presentation Review Guidelines](#).

NextEra Energy employees are expected to:

- » Share only personal opinions online and ensure your posts reflect that they are personal and do not represent the Company's views.
- » Never present yourself—formally or informally—as a Company spokesperson without approval.
- » Avoid posting false, confidential, malicious, harassing, or otherwise inappropriate content about the Company, coworkers, suppliers, or competitors.
- » Protect Company confidential information and comply with securities laws, including prohibitions on sharing inside information.
- » Obtain Marketing & Communications approval before using Company name, logos, images, videos, or other identifying materials online.



Q: Marcus, an employee of NextEra Energy, found an article about our Company on a public Facebook group and responded with his views as an employee. Additionally, he disputed several points in the article, citing his experience and knowledge of our Company's procedures, sparking a Facebook group discussion. During the discussion, Marcus made a joke in response to the comment of one participant, which many found offensive. As a result of Marcus' social media post, several users reported Marcus' posts using the Contact Us form on NextEra Energy's website. Although Marcus is passionate about NextEra Energy, representing the Company online is not one of his responsibilities. Is Marcus conducting himself consistent with Company policies?

A: Although Marcus is passionate about NextEra Energy, representing the Company online is not one of his responsibilities. It is important that, despite his personal feelings, Marcus avoids speaking on behalf of our Company or divulging information online that might be sensitive or confidential. When he identifies himself online as an employee of NextEra Energy, he should also state clearly that any opinions or ideas he expresses are his own – otherwise, taking a position on NextEra Energy issues or making comments about our business can be considered as an authorized Company statement. This can lead to confusion on the Company's official position and the dissemination of misinformation. Finally, posting an offensive joke also violated our **Social Media** policy. Use of social media even on a personal basis can affect the reputation of our Company and the employee's employment. Each employee is responsible for what they post online and inappropriate conduct outside of work could have a negative effect on your coworkers, NextEra Energy's reputation and our ability to serve our customers.

We Treat People With Respect

We Value Our Fellow Employees

You have an important role in building and sustaining an engaged and positive work environment where all employees feel valued. You must show respect for all employees and people with whom the Company does business, including respecting everyone's unique perspectives, ideas and experiences. We want to ensure that all employees have an equal opportunity to be recognized and rewarded according to their efforts and contributions. In order to be successful in this, the Company has an Equal Employment Opportunity Program and we expect all employees to demonstrate their commitment to this policy in their work for the Company.

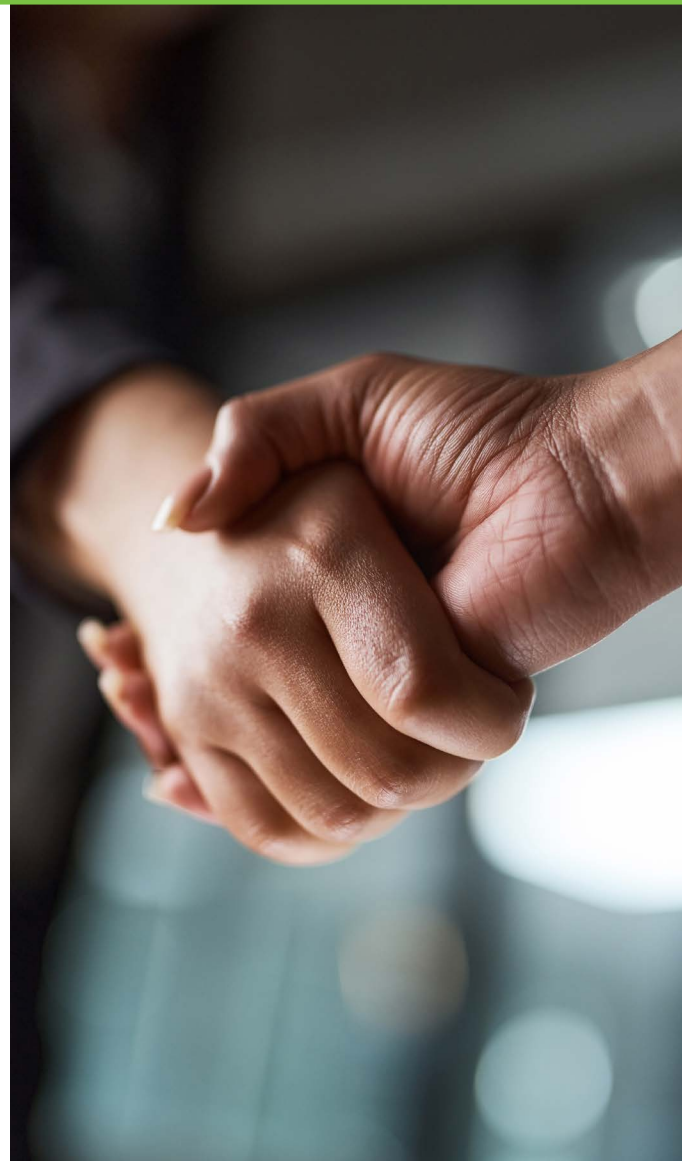
For more information, refer to the Equal Employment Opportunity Program page.

Discrimination and Harassment

As part of our commitment to equal opportunity, NextEra Energy does not make employment-related decisions or tolerate discrimination or harassment against anyone on the basis of any characteristic protected by applicable law.

Employment-related decisions include hiring, promotions, transfers, recruitment, discipline, termination, compensation and selection for training programs.

Harassment is a form of discrimination which can come in the form of verbal or non-verbal conduct by Company employees or third parties. Harassment may include offensive comments, jokes or images related to a protected characteristic.



NextEra Energy is committed to equal employment opportunity and prohibits discrimination and harassment in any form.



Sexual harassment is a form of harassment and may include unwanted advances, inappropriate sexual jokes, sexually suggestive comments, touching, requests for sexual favors or inappropriate comments about another's appearance. All NextEra Energy employees are responsible for ensuring that their comments and actions are always appropriate and respectful.

If you have experienced or observed any discriminatory or harassing behavior, you have a responsibility to report it. You may do so by discussing the situation with your leader, Human Resources or the Senior Director, Engagement & Culture, or by calling the Ethics Hotline at 888.906.9633 or the Equal Employment Opportunity Hotline at [REDACTED] immediately.

For more information, please see the [Employee Policy Handbook](#).

Human Rights

NextEra Energy is committed to conducting business in an ethical and responsible manner that recognizes the fundamentals of human dignity for all people and the protection of human rights. Compliance with this commitment and applicable laws is the responsibility of every employee and we expect the same standards from our suppliers and all other entities with which we do business.

For more information, refer to the [Human Rights](#) policy.



Providing a Safe and Secure Workplace



AT WORK. AT HOME. AT PLAY.

At NextEra Energy, our commitment to doing the job right means doing it safely, every single time. We believe that how we accomplish our work is as important as what we accomplish. Every job can and must be done safely—without exception. We never compromise on protecting our people, our customers, and the communities we serve—because that's what true success looks like. NextEra Energy maintains a comprehensive safety program geared to the prevention of accidents.

If your work requires using or disposing of hazardous materials, be sure to wear protective gear and closely follow all laws and procedures that apply to the particular task.

Likewise, if you drive a vehicle issued to you by NextEra Energy or drive a personal vehicle on behalf of the Company, you must operate it only as directed and always consistent with the law. Be sure to follow all traffic rules, including our Company's policy of no texting while driving.

For more information, refer to [Using Vehicles for Business Purposes](#) and [Use of Communication Devices While Driving](#) policies.

Safety is a shared responsibility that starts with each of us. When we follow Company procedures, properly select and use protective equipment and look out for one another, we create an environment where everyone can work safely and go home healthy every day. PPE requirements are mandatory and must be followed without exception—ensure your equipment is properly fitted, in good condition, and appropriate for the specific hazards you face. In particular, our Company is committed to the highest standards of nuclear safety in the design, operation and maintenance of our nuclear power plants. You may voice your concerns by contacting the Nuclear Safety Employee Concerns hotline by calling [REDACTED]. You can also contact the Nuclear Regulatory Commission (NRC).

For more information, refer to the [Reporting Nuclear Power Plant Deficiencies](#).



You are required to bring to the attention of management any concerns about the safety of design, operation or maintenance of our nuclear plants.

Operating safely also means that working under the influence of any intoxicating substance is strictly prohibited. In addition, you may never use, possess, transfer or sell such substances during working hours or while on NextEra Energy premises. If alcohol is transferred in a sealed container as a gift or is used in moderation at an authorized NextEra Energy event, such limited use is allowed.

For more information, please see the **Controlled Substances and Alcohol Abuse** policy. You have a duty to report any unsafe condition through one of our reporting resources.

NextEra Energy has a database – **FOCUS1440** – that is used to document and investigate unsafe conditions. FOCUS1440 guidance can be found on the **Corporate Safety** eWeb page.

For more information, refer to **Reporting an Unsafe Condition or Act** policy.

A safe environment is also free from all forms of violence. An act of violence can take many forms. It can be a verbal or physical threat, an act of intimidation or abuse or a blatant physical assault. Whatever form it takes, violence has no place in our Company. If you witness an act of violence between any parties working on our Company's behalf, you have a responsibility to report it right away.



Corporate Security and a member of management in your area and/or Human Resources will handle the situation. If the incident escalates and you feel an imminent threat, immediately call Corporate Security at [REDACTED] or the number on the back of your badge, [REDACTED].

There are Company policies and guidelines that provide employees and leaders with the necessary information and resources to fulfill their responsibilities in maintaining a safe and secure work environment. See **Safe & Secure Workplace** policy for more information.

For additional information, review the **Safety and Security** policies.

NextEra Energy employees are expected to:

- » Learn the safety laws and rules that apply to your work—whether that work is being done in the United States or abroad, in an office, operations site, in a nuclear or other plant site or while in transit.
- » Report any suspicion of unethical or illegal behavior to your leader, the head of your business unit, Human Resources or one of the Compliance Officers.
- » Report unsafe conditions using **FOCUS1440**.
- » Provide notice by telephone to the Security Operations Center (at the number on the back of your badge: [REDACTED] or toll free [REDACTED]) of any arrest within 24 hours after the time of arrest (or within 24 hours of release from jail if incarcerated as a result of arrest) or prior to the start of your next scheduled shift or workday, whichever is earlier. An “arrest” includes any arrest, charge, summons, notice to appear or indictment for the commission of, or participation in, a felony or misdemeanor. Additionally, any issued traffic citation that requires a mandatory court appearance must be reported to the Security Operations Center within 24 hours of receipt.

Q: Troy drives his Company car to work and one day he leaves home later than usual. While driving, he receives a text message from his manager who is attending a conference out of state, asking for the status of a project. Troy is worried that his manager needs a response right away and waiting until he arrives at the office might be too late. He knows it is against the Company safety policy – and the law – to text while driving, but a short answer to his manager would save him grief later. What could it hurt – just this once?

A: There is no circumstance that makes it okay to text while driving whether that be driving a Company car or driving a personal vehicle. In fact, Troy should not even read text messages while driving. Troy should either wait until he arrives at the office to text, or he should pull over to a safe location and park the vehicle before reading and answering a text. See the [Use of Communication Devices While Driving](#) policy.

We Compete with Integrity

We never sacrifice our integrity to win business. This means we comply with all applicable antitrust and competition laws, wherever we do business. While complex, these laws are meant to ensure a level-playing field and fair competition in the marketplace.

In practice, these laws require that we make independent business decisions, never engaging in unfair business practices, colluding with our competitors or making other inappropriate business arrangements.

You must take special care not to discuss any of the following with our competitors:

- » Pricing, costs or marketing strategies.
- » Market or customer distribution.
- » Bids for contracts.

If a competitor attempts to talk to you about any of these topics – or invites you into any other anti-competitive behavior – you should stop the conversation immediately and inform a Compliance Officer. Keep in mind that even the appearance of anti-competitive behavior can undermine trust in our business and violate our commitment to ethical conduct. Avoid situations that could create the appearance of improper conduct—such as discussing pricing, strategy, or other sensitive



topics with competitors at trade shows, industry events or trade association meetings.

Competing with integrity also means we always gather competitive information ethically and legally. We never misrepresent ourselves in order to get information. We must also never ask former employees of competitors, regardless of their current role at NextEra Energy—to share confidential information from their previous employer.

Q: Jared is excited to represent NextEra Energy at the Energy Storage Power Convention this year. He has been with the Company for 10 years and is excited about all the progress being made in more environmentally-friendly power resources. He knows that making strides in this area is the key to future success. For months now, Jared has served on a focus group, planning how to expand NextEra Energy's energy storage efforts. When he arrives at the convention center, Jared can hardly believe that his college roommate is seated just two rows in front of him representing another energy storage company. He thinks to himself, "I should ask Dave to go to dinner after this is over. We can reminisce, catch up and maybe even brainstorm about what we hear today. This will be awesome."

A: Jared is correct that expanding energy storage offerings is important to NextEra Energy. However, Jared is incorrect in thinking that talking to a competitor's employee about ideas and strategies is a good idea. While Jared is welcome to catch up on personal matters with his old buddy, he should not in any way talk about NextEra Energy customers, strategies, contracts or projects in development. Likewise, Jared should not ask Dave any inappropriate questions in an attempt to get information about Dave's company and its advances in energy storage.

We Treat Our Customers and Suppliers Fairly

At NextEra Energy, we let integrity and honesty guide our interactions with our customers and our suppliers. We pride ourselves on the quality of our products, services and operations. We are honest about our work. We are committed to doing business with suppliers who provide goods and services that meet or exceed our high standards. In turn, we expect our contractors, consultants, suppliers and vendors (each a "Supplier" and collectively, the "Suppliers") to adhere to the terms of the NextEra Energy, Inc. Supplier Code of Conduct. If you experience an issue with supplier performance, contact the VP, Integrated Supply Chain at once so that the issue may be addressed.

We do not make misleading, false or exaggerated claims about our services. We carefully and accurately represent the quality, features and availability of our products and services and ensure that all of our marketing and promotional materials contain an accurate discussion of our offerings.

We Protect Third Parties' Information and Property

The third parties we work with – customers, suppliers, contractors, consultants and business partners – frequently share their confidential information and intellectual property with NextEra Energy. We must protect that information just as carefully as we protect our own information. This helps create an environment of trust with our partners and ensures that NextEra Energy maintains its compliance with all data protection and privacy laws. Never disclose such information without ensuring that you have the authority to do so. If such disclosure is to a third party, also ensure that NextEra Energy has the appropriate signed nondisclosure agreements with the third parties. Be especially careful when preparing advertising or promotional materials or when using the name or printed materials of another company. Materials subject to copyrights may not be used, posted on, copied or sent through our Company's systems without permission from the copyright holder. For more information, see the [Corporate Privacy](#) policy.

Those of you who work on or around our customers' property have a special obligation. In the event that damage occurs or is unavoidable while providing service, it should be kept to a minimum and the property restored when the work is finished. For more information, refer to the [Damage to Non-FPL Property](#) policy or [General Counsel](#) for other entities' property damage procedures.

Apply the same security measures to third-party confidential information and intellectual property as you do to our own sensitive Company information.



Waivers

Our Company generally will not grant waivers. Any waiver of any provision of our Code for executive officers (as “officer” is defined in Rule 16(a)-1(f) under the Securities Exchange Act of 1934, as amended) or directors must be approved by the Board of Directors or a designated committee of the Board. Any such waiver must be promptly disclosed to shareholders in accordance with applicable New York Stock Exchange rules. Employees seeking a waiver to any provision of our Code should consult a Compliance Officer.

Adopted March 31, 2004. Most recently revised October 23, 2025.



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For more information, go to:

NextEraEnergy.com

FPL.com

NextEraEnergyResources.com